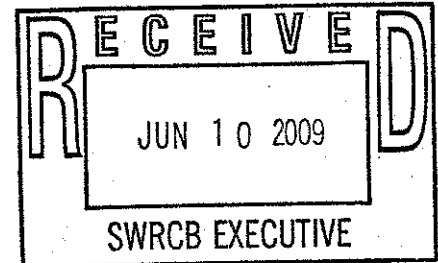




June 10, 2009

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 "I" Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov
Fax: 916-341-5620



Re: Comments to June 16, 2009 Board Meeting Session Resolution to Clarify Implementation of Economic Recovery Legislation for the Clean Water State Revolving Fund Program.

Dear Ms. Townsend:

The State Water Resources Control Board staff has been working hard in developing recommendations for distribution of American Recovery and Reinvestment Act of 2009 (ARRA) subsidy funds from the Clean Water State Revolving Fund (CWSRF) program. Staff has developed a draft item to present to the State Board to clarify implementation of American Recovery and Reinvestment Act of 2009 (ARRA) subsidy fund for the Clean Water State Revolving Fund (CWSRF) projects. We understand that State Board staff is recommending splitting the \$42 Million in subsidy funds equally between disadvantaged communities (DACs) wastewater projects (\$21 M) and new Expanded Use projects (\$21 M). For the Expanded Use projects, the State Board staff is recommending that funds be prioritized to urban stormwater projects serving DACs.

Urban area funding (including stormwater) is one of seven NPS categories and includes 15 of the 61 NPS management measures. We request that the State Board also consider rural projects (another NPS category) in their distribution of funds to Expanded Use Projects and that the funds be distributed on a competitive basis based upon a projects ability to meet SRF goals: water quality improvements, improving beneficial uses, and preventing the degradation of water resources. Many rural areas are under extreme stress because of drought, the poor financial condition of the State, and regulatory requirements. These communities should have equal access to funds for protecting water quality and helping the local economy.

Sincerely,

Cynthia Lawhon,
Administrative Director
The River Exchange